

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

FILED  
IN CLERKS OFFICE

2004 JUN 16 P 3:32

OTIS ELEVATOR COMPANY )  
Plaintiff; )  
v. )  
LOCAL 4, INTERNATIONAL UNION )  
OF ELEVATOR CONSTRUCTORS; )  
MICHAEL LANGER, INDIVIDUALLY, )  
and as BUSINESS MANAGER; )  
KEVIN McGETTIGAN, INDIVIDUALLY, )  
and as BUSINESS REPRESENTATIVE; )  
STEVE MORSE, INDIVIDUALLY, and )  
as BUSINESS REPRESENTATIVE; )  
and all others conspiring, acting in concert )  
or otherwise participating with them or )  
acting in their aid or behalf, )  
Defendants. )

U.S. DISTRICT COURT  
DISTRICT OF MASS.  
Docket No. 1:04-cv-11108-JLT

**PLAINTIFF'S MOTION FOR LEAVE TO FILE A REPLY MEMORANDUM**

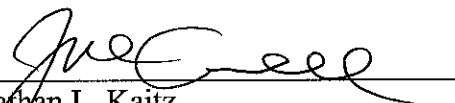
Pursuant to Local Rule 7.1(B)(3), Plaintiff Otis Elevator Company ("Otis") moves for leave of court to submit a reply memorandum. A copy of the proposed reply memorandum is submitted herewith. Otis seeks to submit this memorandum to address the pending expiring of this Court's temporary restraining order and the lack of clarity between the parties' regarding the effect of such extension. This proposed memorandum does not merely reiterate Otis's arguments in its initial memorandum, but rather, is necessary to address both fact and legal positions set forth by Defendants. This short reply memorandum will assist the Court in efficiently and effectively adjudicating this matter.

Respectfully submitted,

Dated at Boston, Massachusetts  
June 16, 2004

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By

  
Nathan L. Kaitz  
Joseph McConnell

and

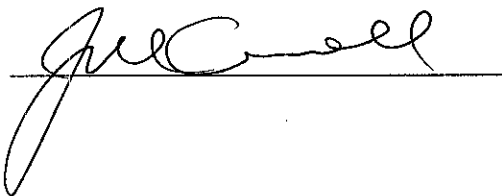
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ATTORNEYS FOR PLAINTIFF  
OTIS ELEVATOR COMPANY

### CERTIFICATE OF SERVICE

The foregoing document was served today by hand upon Paul Kelly, Esquire, counsel for Defendants, Segal, Roitman & Coleman, 11 Beacon Street, Boston, MA 02108, this 16th day of June 2004.



BRT.53084.1